

BEFORE THE MISSOURI REAL ESTATE COMMISSION

MISSOURI REAL ESTATE COMMISSION)	
)	
Petitioner,)	
)	
v.)	No. 17-0585 RE
)	
THERESA MARIE STACEY)	
)	
Respondent.)	

**FINDINGS OF FACT, CONCLUSIONS OF LAW
AND DISCIPLINARY ORDER**

On or about September 17, 2018, the Administrative Hearing Commission entered its Decision (“Decision”) in the case of *Missouri Real Estate Commission v. Theresa Marie Stacey*, No. 17-0585 RE. In that Decision, the Administrative Hearing Commission found that Respondent Theresa Marie Stacey’s salesperson license (license no. 2016001412) is subject to disciplinary action by the Missouri Real Estate Commission (“Commission”) pursuant to § 339.100.2(16), (18), and (25), RSMo.¹

The Commission has received and reviewed the record of the proceedings before the Administrative Hearing Commission including the Decision of the Administrative Hearing Commission. The record of the Administrative Hearing Commission is incorporated herein by reference in its entirety.

Pursuant to notice and §§ 621.110 and 339.100.3, RSMo, the Commission held a hearing on February 6, 2019, at the Division of Professional Registration, 3605 Missouri Boulevard, Jefferson City, Missouri, for the purpose of determining the appropriate disciplinary action against Respondent’s license. All of the members of the Commission were present throughout

¹ All statutory references are to the Revised Statutes of Missouri 2000, as amended, unless otherwise indicated.

the meeting. Further, each member of this Commission has read the Decision of the Administrative Hearing Commission. The Commission was represented by Assistant Attorney General Gerald Jackson. Respondent having received proper notice and opportunity to appear did appear in person with legal counsel, Terry Allen. After being present and considering all of the evidence presented during the hearing, the Commission issues the following Findings of Facts, Conclusions of Law and Order.

Based upon the foregoing the Commission hereby states:

I.

FINDINGS OF FACT

1. The Commission is an agency of the state of Missouri created and established pursuant to § 339.120, RSMo, for the purpose of licensing all persons engaged in the practice as a real estate entity in this state. The Commission has control and supervision of the licensed occupations and enforcement of the terms and provisions of §§ 339.010-339.205 and 339.710-339.855, RSMo.

2. The Commission hereby adopts and incorporates by reference the Decision, and the record of the Administrative Hearing Commission in *Missouri Real Estate Commission v. Theresa Marie Stacey*, Case No. 17-0585 RE, issued September 17, 2018, in its entirety and takes official notice thereof.

3. The Commission set this matter for disciplinary hearing and served notice of the disciplinary hearing upon Respondent in a proper and timely fashion. Respondent did appear in person with legal counsel, Terry Allen, at the hearing before the Commission.

4. This Commission licensed Respondent Theresa Marie Stacey as a salesperson, license number 2016001412. Respondent's license was current at all times relevant to this proceeding.

II.

CONCLUSIONS OF LAW

5. This Commission has jurisdiction over this proceeding pursuant to §§ 621.110 and 339.100, RSMo.

6. The Commission expressly adopts and incorporates by reference the Decision issued by the Administrative Hearing Commission dated September 17, 2018, in *Missouri Real Estate Commission v. Theresa Marie Stacey*, Case No. 17-0585 RE, takes official notice thereof, and hereby enters its Conclusions of Law consistent therewith.

7. As a result of the foregoing, and in accordance with the Administrative Hearing Commission's Decision dated September 17, 2018, Respondent's salesperson license, number 2016001412, is subject to disciplinary action by the Commission pursuant to § 339.100.2(16), (18), and (25), RSMo.

8. The Commission has determined that this Order is necessary to ensure the protection of the public.

III.

ORDER

Having fully considered all the evidence before the Commission, and giving full weight to the Decision of the Administrative Hearing Commission, it is the **ORDER** of the Commission that the salesperson license of Theresa Marie Stacey (license no. 2016001412) is hereby **REVOKED**. All evidence of licensure shall be immediately returned to the Commission within 30 days of this Order, if Respondent has not already done so.

The Commission will maintain this Order as an open, public record of the Commission as provided in Chapters 339, 610 and 324, RSMo.

SO ORDERED, EFFECTIVE THIS 15TH DAY OF FEBRUARY, 2019.

MISSOURI REAL ESTATE COMMISSION


Terry W. Moore, Executive Director

Before the
Administrative Hearing Commission
State of Missouri



MISSOURI REAL ESTATE COMMISSION,)

Petitioner,)

v.)

No. 17-0585)

THERESA MARIE STACEY,)

Respondent.)

DECISION

There is cause to discipline Theresa Marie Stacey's real estate license under § 339.100.2 (16), (18), and (25).¹

Procedure

On May 2, 2017, the Missouri Real Estate Commission (MREC) filed a complaint seeking to discipline Stacey's license. On May 15, 2017, Stacey was served with our notice of complaint/notice of hearing, and on May 22, 2017, she filed her answer. On March 15, 2018, we held a hearing. Assistant Attorney General Gerald Jackson appeared for MREC; Stacey appeared in person and was represented by Terry C. Allen with the Allen Law Office, LLC. The case became ready for our decision on July 2, 2018, the date the last brief was filed.

Findings of Fact

1. Stacey is licensed by MREC as a salesperson, and her license was active and current at all relevant times.

¹ Statutory references, unless otherwise noted, are to RSMo 2016.

2. On May 6, 2015, Stacey pled guilty in the Riverside County Superior Court, California, to one count of residential burglary and one count of grand theft in violation of California Penal Code § 459 and 487(a) (2014) (the California offenses).

3. Stacey is currently serving probation in California for the California offenses.

4. In late 2015, MREC received an application for licensure from Stacey. On her application, Stacey did not disclose a guilty plea to a criminal offense.

5. MREC granted Stacey a license effective through September 30, 2016.

6. In 2016, MREC received information about the California offenses, and Douglas Keeney, an investigator for MREC, opened an investigation on March 1, 2016.

7. On March 2, 2016, MREC received an Application for License/Information Change from Stacey indicating a change of broker. No former broker is listed; James Dohr appears as the new broker. On this form, Stacey again did not disclose a guilty plea to a criminal offense.

8. On March 14, 2016, MREC received an Application for License/Information Change from Stacey indicating a change of broker. James Dohr is listed as the former broker; Cheryl Meglio appears as the new broker. On this form, Stacey again did not disclose a guilty plea to a criminal offense.

9. The March 14, 2016 application bears a stamp, "APPROVED MREC."

10. Sometime in 2016, Stacey applied for renewal, and disclosed the California offenses.

MREC renewed Stacey's license through September 30, 2018.

11. On the Application for License/Information Change, the applicant is asked:

Have you been finally adjudicated and found guilty, or entered a plea of guilty or nolo contendere, in a criminal prosecution in this state, or any other state, or of the United States, whether or not a sentence was imposed? **NOTE: This includes Suspended Imposition of Sentence, Suspended Execution of Sentence, misdemeanor and felony convictions, and alcohol related offenses, i.e. DWI and BAC.** Check yes if NOT previously disclosed to this Commission and

provide the date of the conviction and/or pleading, nature of this offense, court location, and case number on a separate sheet.

Ex. 1. A choice of yes or no follows.

12. On the initial application for licensure, a substantially similar question is asked.²

Conclusions of Law

We have jurisdiction over MREC's complaint. Sections 339.100.2 and 621.045. MREC has the burden to prove that Stacey's license is subject to discipline. *Missouri Real Estate Comm'n v. Berger*, 764 S.W.2d 706, 711 (Mo. App. E.D. 1989).

MREC alleges in its complaint that there is cause to discipline Stacey's license under § 339.100.2 (10), (16), (18), (19), and (25) for failing to disclose the California offenses on three separate applications. Stacey's primary defense is that even after MREC came into possession of the relevant information, it renewed Stacey's license, and having done so, has waived its right to seek discipline for matters occurring on or before March 2, 2016. Stacey's argument is a form of estoppel or laches. These are equitable defenses. *UAW-CIO Local #31 Credit Union v. Royal Ins. Co.*, 594 S.W.2d 276, 281 (Mo. 1980). As an administrative agency, we have no authority to apply the doctrines of equity. *Soars v. Soars-Lovelace, Inc.*, 142 S.W.2d 866, 871 (Mo. 1940).

We therefore turn to the statutes at issue.

I. Section 339.100.2(10) and (25) Representations to MREC

Section 339.100.2(10) authorizes discipline for: "[o]btaining a certificate or registration of authority, permit or license for himself or herself or anyone else by false or fraudulent representation, fraud or deceit[.]" Section 339.100.2(25) does the same for:

Making any material misstatement, misrepresentation, or omission with regard to any application for licensure or license renewal. As used in this section, "material" means important information about which the commission should be informed and which may influence a licensing decision[.]

² The initial application was not presented or offered into evidence. Keeney testified that Stacey submitted the initial application and that it has the same questions regarding past convictions.

Fraud is an intentional perversion of truth to induce another to act in reliance upon it. *Hernandez v. State Bd. of Regis'n for Healing Arts*, 936 S.W.2d 894, 899 n.2 (Mo. App. W.D. 1997). It requires the intent that others rely on the misrepresentation. *Sofka v. Thal*, 662 S.W.2d 502, 506 (Mo. banc 1983); *see also Missouri Dental Bd. v. Bailey*, 731 S.W.2d 272 (Mo. App. 1987). We may infer fraudulent intent from the circumstances of the case. *Essex v. Getty Oil Co.*, 661 S.W.2d 544, 551 (Mo. App. W.D. 1983). To "deceive" is "to cause to believe the false." WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY 584 (unabr. 1986).

By checking a box and submitting a document, Stacey did convey false information to MREC. But subdivision (10) requires an element of intent. Stacey testified that she mistakenly thought the question regarding criminal convictions referred only to Missouri convictions. She disclosed her crimes to her employer. And when Keeney interviewed her – only a few weeks after submitting the change of broker applications – she was cooperative and forthcoming. MREC argues that the question to the applicant is clear, and that we should infer intent from Stacey's repetition of the misstatement. Despite the repetition, we find Stacey's testimony that her misstatement was a mistake credible. Her misreading of the question was perhaps negligent, but not intentional. And she corrected the mistake as soon as it was called to her attention.

As for the materiality of the misstatements under subdivision (25), Stacey argues that the best evidence of a misstatement's influence upon a licensing decision is whether, when MREC came into possession of the information, it actually changed the result. And it did not. With full knowledge of the California offenses, MREC renewed Stacey's license for the period September 30, 2016 to September 30, 2018. Stacey's argument, however, assumes that the Board's only options were to grant or deny a license. In fact, it has a number of other options, including issuing of a probated license or, as it chose to do here, seeking discipline by filing a complaint before this Commission. *See, Bhuket v. State ex rel. Missouri Bd. of Regis'n for the Healing Arts*,

787 S.W.2d 882, 885 (Mo. App. W.D. 1990). Section 339.100.2(18), discussed further below, authorizes discipline for having been convicted of a crime. We believe the statute makes a criminal conviction material to the Board's decision as a matter of law. And the statute further distinguishes a "misrepresentation" in subdivision (10) from a "misstatement" in subdivision (25). Even if we believe that Stacey made the statement on her application without any intent to mislead or deceive anyone, it was negligent and a material misstatement. We find there is cause to discipline Stacey's license under § 339.100.2(25), but not § 339.100.2(10).

II. Section 339.100.2(18) Criminal Offenses

Section 339.100.2(18) authorizes discipline for:

[having b]een finally adjudicated and found guilty, or entered a plea of guilty or nolo contendere, in a criminal prosecution under the laws of this state or any other state of the United States, for any offense reasonably related to the qualifications, functions or duties of any profession licensed or regulated under this chapter, for any offense an essential element of which is fraud, dishonesty or an act of violence, or for any offense involving moral turpitude, whether or not sentence was imposed[.]

The guilty plea is sufficient to find discipline under § 339.100.2(18) if we find the criminal offense (1) is reasonably related to the qualifications, functions or duties of a real estate professional, (2) has an essential element of fraud, dishonesty or an act of violence, or (3) involves moral turpitude.

Stacey pled guilty to one count of residential burglary and one count of grand theft under California penal code.³ The criminal complaint charged her with entering an inhabited dwelling house to commit theft and a felony, and willfully and unlawfully stealing, taking, and defrauding money or property. The element of fraud is in the charging document itself. Fraud is also a

³ Section 459 of the California Penal Code (2014), provides in part: "Every person who enters any house, room, apartment, tenement,...with intent to commit grand or petit larceny or any felony is guilty of burglary...." Section 487 of the California Penal Code (2014), provides in part: "Grand theft is theft committed in any of the following cases: (a) When the money, labor, or real or personal property taken is of a value exceeding nine hundred fifty dollars (\$950)...."

synonym for dishonesty. MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY 359 (11th ed. 2004).

Moreover, moral turpitude is inherent in crimes that have an intent to defraud or steal. *See, In re Carpenter*, 891 A.2d 223 (D.C. 2006). Stacey pled guilty to a crime of which fraud is an essential element, and is subject to discipline under § 339.100.2(18).

II. Section 339.100.2(16) Acts that Would Be Grounds for Refusal

MREC argues that Stacey is subject to discipline under § 339.100.2(16) for

“[c]ommitting any act which would otherwise be grounds for the commission to refuse to issue a license under section 339.040.” Section 339.040 contains the mandatory qualifications for licensure, including a requirement that applicants present satisfactory proof to MREC that they: (1) are persons of good moral character; (2) bear a good reputation for honesty, integrity, and fair dealing; and (3) are competent to transact the business of a broker or salesperson in such a manner as to safeguard the interest of the public.

Good moral character is honesty, fairness, and respect for the law and the rights of others. *Hernandez*, at 899 n.1. MREC offered no evidence beyond the charging document of the acts Stacey committed underlying the California offenses, and in fact, Keeney testified on cross-examination that the criminal acts had nothing to do with real estate, and that post-dated checks had been deposited early by her staff and not Stacey herself. But as we noted above, the crimes to which Stacey pled guilty are crimes involving fraud by their terms under California law. The commission of such a crime is contrary to honesty, fairness, and respect for the law and the rights of others.

“Reputation” means “overall quality or character as seen or judged by people in general[.]” WEBSTER'S at 1058. Reputation is not a person's actions; it is “the general opinion ... held of a person by those in the community in which such person resides[.]” *State v. Ruhr*, 533 S.W.2d 656, 659 (Mo. App. W.D. 1976) (quoting BLACK'S LAW DICTIONARY, REV. 4th Ed., p.

1467-68). Reputation is “a consensus view of many people.” *Haynam v. Laclede Elec. Coop.*, 827 S.W.2d 200, 206 (Mo. banc 1992). MREC presented no evidence as to Stacey’s reputation.

Competence, when referring to occupation, is “the actual ability of a person to perform in that occupation.” Section 1.020. It also refers to the “disposition to use an otherwise sufficient professional ability.” *Johnson v. Missouri Bd. of Nursing Administrators*, 130 S.W.3d 619, 642 (Mo. App. W.D. 2004). In the context of professional licensure, our Supreme Court described incompetency as a “state of being” amounting to an inability or unwillingness to function properly. *Albanna v. State Bd. of Regis’n for the Healing Arts*, 293 S.W.3d 423 (Mo. banc 2009). The *Albanna* court said that the evaluation necessitates a broader-scale analysis, taking into account the licensee’s capacities and successes. *Id.* at 435. MREC failed to present evidence that Stacey is incompetent to transact the business of a real estate salesperson in such a manner as to safeguard the interest of the public.

We conclude that MREC has carried its burden to show the lack of good moral character required by § 339.040.1(1). Accordingly, we find cause for discipline under § 339.100.2(16).


II. Section 339.100.2(19) Other Conduct

MREC argues that Stacey is subject to discipline under § 339.100.2(19) for “any other conduct which constitutes untrustworthy, improper or fraudulent business dealings or demonstrates bad faith or gross incompetence[.]” The adjective “other” means “not the same : DIFFERENT, any [other] color would have been better[.]” WEBSTER’S at 878-879. Therefore, subdivision (19) refers to conduct different than referred to in the remaining subdivisions of the statute. We have found that the conduct at issue is cause for discipline based on the California offenses and the failure to report them. There is no “other” conduct. Therefore, we find no cause for discipline under § 339.100.2(19).

Summary

There is cause to discipline Theresa Marie Stacey's license under § 339.100.2 (16), (18), and (25).

SO ORDERED on September 17, 2018.



BRETT W. BERRI
Commissioner

BEFORE THE
ADMINISTRATIVE HEARING COMMISSION
STATE OF MISSOURI

MISSOURI REAL ESTATE
COMMISSION
3605 Missouri Blvd.
P.O. Box 1339
Jefferson City, MO 65102-1339,

Petitioner,

v.

THERESA MARIE STACEY
2104 Rugger Circle
St. Charles, MO 63303
Telephone: (636) 675-8605

Respondent,

FILED

MAY 02 2017

ADMINISTRATIVE HEARING
COMMISSION

Case No:

COMPLAINT

Petitioner, the Missouri Real Estate Commission (MREC), by and through the Missouri Attorney General's office, states for its cause of action as follows:

1. The MREC is an agency of the State of Missouri created and existing pursuant to §339.120, RSMo,¹ for the purpose of executing and enforcing the provisions of §§339.010 to 339.180 and §§339.710 to 339.860, RSMo 2000 (as amended), relating to real estate salespersons and brokers.

¹All statutory citations are to the 2013 Cumulative Supplement to the Revised Statutes of Missouri, unless otherwise noted.

2. Respondent Theresa Stacey is licensed by the MREC as a salesperson, license no. 2016001412. Stacey's license is active and current.

3. Jurisdiction and venue are proper before the Administrative Hearing Commission pursuant to §§621.045 and 339.100.2, RSMo.

4. On December 30, 2015, the MREC received an application for license from Stacey. On her application, Stacey did not disclose a guilty plea to criminal offenses.

5. On March 2, 2016, the MREC received an Application for License/Information Change, indicating a change of broker. On this form, Stacey again did not disclose a guilty plea to criminal offenses.

6. On or about May 6, 2015, Stacey pled guilty to one count of Residential Burglary and one count of Grand Theft, in the Riverside County Superior Court, California, in violation of California Penal Code sections 459 and 487(a) (2014).

7. Section 459 of the California Penal Code (2014), provides in part:

Every person who enters any house, room, apartment, tenement,...with intent to commit grand or petit larceny or any felony is guilty of burglary...

8. Section 487(a) of the California Penal Code (2014), provides in part:

Grand theft is theft committed in any of the following cases:

.....

(a) When the money, labor, or real or personal property taken is of a value exceeding nine hundred fifty dollars (\$950)...

9. Section 339.040.1, RSMo (Supp. 2013), setting forth the grounds for issuance of a salesperson license, states:

Licenses shall be granted only to persons who present, and corporations, associations, partnerships, limited partnerships, limited liability companies, and professional corporations whose officers, managers, associates, general partners, or members who actively participate in such entity's brokerage, broker-salesperson, or salesperson business present, satisfactory proof to the commission that they:

(1) Are persons of good moral character; and

...

(3) Are competent to transact the business of a broker or salesperson in such a manner as to safeguard the interest of the public.

10. Section 339.100.2, RSMO (Supp. 2013), which states in pertinent part:

2. The commission may cause a complaint to be filed with the administrative hearing commission as provided by the provisions of chapter 621 against any person or entity licensed under this chapter or any licensee who has failed to renew or has surrendered his or her individual or entity license for any one or any combination of the following acts:

.....

(10) Obtaining a certificate or registration of authority, permit or license for himself or herself or anyone else by false or fraudulent representation, fraud or deceit;

.....

(16) Committing any act which would otherwise be grounds for the commission to refuse to issue a license under section 339.040;

.....

(18) Been finally adjudicated and found guilty, or entered a plea of guilty or nolo contendere, in a criminal prosecution under the laws of this state or any other state of the United States, for any offense reasonably related to the qualifications, functions or duties of any profession licensed or regulated under this chapter, for any offense an essential element of which is fraud, dishonesty or an act of violence, or for any offense involving moral turpitude, whether or not sentence was imposed;

(19) Any other conduct which constitutes untrustworthy, improper or fraudulent business dealings, demonstrates bad faith or incompetence, misconduct, or gross negligence;

.....

(25) Making any material misstatement, misrepresentation, or omission with regard to any application for licensure or license renewal. As used in this section, "material" means important information about which the commission should be informed and which may influence a licensing decision;

11. Based on the facts alleged above, Stacey has obtained a license for herself by false or fraudulent representation, providing cause to discipline her license pursuant to §339.100.2(10), RSMo.

12. Based on the facts alleged above, Stacey has engaged in conduct that would be grounds for the MREC to refuse to issue a license under section 339.040, providing cause to discipline her license pursuant to §339.100.2(16), RSMo.

13. Based on the facts alleged above, in that Stacey pled guilty in a criminal prosecution under the laws of the state of California to offenses that are reasonably related to the qualifications, functions and/or duties of a salesperson; to offenses in which fraud and/or dishonesty is an essential element; and to offenses involving moral turpitude, cause exists to discipline Stacey's license pursuant to §339.100.2(18), RSMo.

14. Based on the facts alleged above, Stacey's conduct constitutes untrustworthy, improper, and/or fraudulent business dealings and/or demonstrates bad faith, incompetence, misconduct, and/or gross negligence, providing cause to discipline Stacey's license under § 339.100.2(19), RSMo.

15. Based on the facts alleged above, Stacey has obtained a license for herself by making a material misstatement, misrepresentation, or

omission with regard to her application for licensure, providing case to discipline her license pursuant to §339.100.2(25), RSMo.

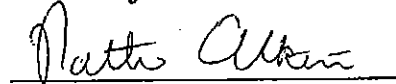
16. Cause exists to discipline Stacey's license as a salesperson pursuant to §339.100.2(10), (16), (18), (19) and (25), RSMo.

WHEREFORE, Petitioner requests that the Administrative Hearing Commission conduct a hearing in this case pursuant to Chapter 621, RSMo, and issue its Findings of Fact and Conclusions of Law determining that Petitioner may take disciplinary action against the license of Respondent, Theresa Stacey, as salesperson for the violations noted above, and for such other relief as the Commission deems appropriate.

Respectfully submitted,

JOSHUA D. HAWLEY

Attorney General



Nathan M. Atkinson

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BEFORE THE ADMINISTRATIVE HEARING COMMISSION
STATE OF MISSOURI

FILED

MAY 22 2017

ADMINISTRATIVE HEARING
COMMISSION

MISSOURI REAL ESTATE COMMISSION
PO BOX 1557
Jefferson City, Mo 65102

Petitioner

Vs.

Case No. 17-0585

THERESA MARIE STACEY
2104 Rugger Circle
St. Charles, Mo 63303

Respondent

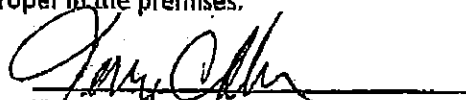
ANSWER

Comes Now the Respondent by her Attorney and Answers the Complaint as follows:

1. Admits the allegations in paragraphs 1, 2, and 3 of the Petition.
2. Admits the allegations in paragraph 4 further answering that she explained to the Investigator what happened and that it was not intentional simply a misunderstanding and her license was subsequently renewed by the Petitioner.
3. Admit the allegations in paragraph 5 of the Petition further stating that when called to her attention she did disclose in writing and had disclosed to the broker her plea of guilty and circumstances in California. She did not act intentionally to deceive anyone and her license was subsequently renewed by the Board.
4. Admit the allegations in paragraph 6.
5. As to paragraphs 7, and 8 of the Petition, she assumes that the laws are correctly cited from California and therefore admits that them.

6. Admits the allegations in paragraphs 9 and 10 of the Petition but denies that she has violated the provisions of Missouri law in those paragraphs in any way as alleged or intimated.
7. Denies the allegations in paragraphs 11,12, 13, 14 15 and 16, of the Petition and further states that knowing what happened the Commission renewed her license and that she provided the Commission with evidence of her character and honesty. She has acted in good faith for all purposes herein, is not incompetent, as not committed misconduct nor was she or is she grossly negligent, nor is she untrustworthy, nor did she act fraudulently or dishonestly, nor did she act in bad faith or improperly. She has demonstrated that she is a good licensee with good character despite any circumstances in California.
8. Deny each and every allegation not specifically admitted by this Answer.

WHEREFORE HAVING FULLY ANSWERED, upon a hearing and proof adduced, the Respondent prays that the Administrative Hearing Commission finds no reason to discipline her and that the Complaint be dismissed and such further relief as may be proper in the premises.


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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

A COPY OF THE FOREGOING Answer mailed to Nathan Atkinson, Assistant Attorney General on this the 22 of May, 2017 to his address PO box 899, Jefferson City, Mo 65102, and faxed to him the same day.

ALLEN LAW OFFICES, L.L.C.

FILED

P.O. Box 1702

MAY 22 2017

Jefferson City, Missouri 65102

ADMINISTRATIVE HEARING
COMMISSION

terry@tcallenlawoffices.com

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May 22, 2017

Faxed and mailed 751 5018

ADMINISTRATIVE HEARING COMMISSION

P O Box 1557

Jefferson City, Mo 65102

Re: Mo Real Estate Commission v. Stacey No. 17-0585

Enclosed is Answer. Thank you.


Terry C. Allen, No 19894
Attorney for Respondent

Enclosure:

CC:

Nathan Atkinson,

Assistant AG

PO Box 899

Jefferson City, Mo. 65102